

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

NORTHERN DIVISION

CYNTHIA ELLISON,

Plaintiff

V.

AUBURN UNIVERSITY
MONTGOMERY,

Defendant

Civil Action No.

2:05CV902-MHT-DRB

DECLARATION OF NELL ROBINSON

1. I am Nell Robinson; I am over 18 years old, I have no mental disabilities; and I make this declaration on personal knowledge.

2. I am the Chief of the Auburn University Montgomery Campus Police. I have been an officer on the force for 16.5 years, and I have been Chief for over 2 years.

3. I have known Cynthia Ellison professionally for over 16 years.

4. Over the years that I have been on the Campus Police force and have known Cynthia Ellison, Ms. Ellison has called Campus Police on different occasions for various reasons. She has called regarding handicap parking for herself, and she has called regarding a confrontation she had with a co-worker. If she needed our assistance, it is obvious to me that she knew how to get our

attention. Ms. Ellison never requested any security or protection from the Campus Police force.

5. As a matter of course, the Campus Police force provides personal escorts to vehicles for faculty, staff, and visitors to campus, if they ask for it. To my knowledge, the Campus Police force has never turned down an escort request. To my further knowledge, Ms. Ellison never asked the Campus Police force for an escort to her car.

6. In late January 2005, Roger Ritvo, the Vice Chancellor, asked the Campus Police force to be present in close proximity to his office during a disciplinary conference with Dr. Chris Mahaffy. We complied with his request, which is not unusual for a disciplinary setting.

7. A short time later, Dr. Ritvo again called us to ensure a Campus Police force presence in Goodwyn Hall, where the School of Sciences had its offices, and also to ensure that we periodically checked on the well-being of Ms. Ellison.

8. We made a special trip to see Ms. Ellison, and for several days we made 4 or 5 special trips each shift to her office to check on her. She never called us about any concern or fear she had about Dr. Chris Mahaffy, and she never requested a personal escort to her car, which we would have provided.

9. In addition, as a matter of course, the Campus Police inspect or do a walk-through of Goodwyn Hall about 3 times per day. Although we have a physical presence in Goodwyn Hall, it is unlikely that Ms. Ellison would have known we were there at any particular time due to the location of her office.

10. I never felt that Ms. Ellison was in any physical jeopardy because of Dr. Mahaffy.

I declare under penalty of perjury that this Declaration is true and correct.

7-14-06
Date

Nell Robinson
Nell Robinson
Chief of AUM Police